

# **EXHIBIT E**

Reitler Kailas & Rosenblatt LLC  
885 Third Avenue, 20th Floor  
New York, New York 10022  
Main: 212-209-3050  
Fax: 212-371-5500  
Email: [plicalsi@reiterlaw.com](mailto:plicalsi@reiterlaw.com)

CSReeder, PC  
11766 Wilshire Blvd., Suite 1470  
Los Angeles, CA 90025  
Telephone: (310) 861-2470  
Facsimile: (310) 861-2476  
Email: [mark@csrlawyers.com](mailto:mark@csrlawyers.com)  
(Admission pending *pro hac vice* application)  
*Attorneys for Plaintiff Lynne Freeman*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- x

LYNNE FREEMAN, an individual,

Case No. 1:22-cv-02435-LIS

Plaintiff,

-against-

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF,  
an individual, EMILY SYLVAN KIM, an individual,  
PROSPECT AGENCY, LLC, a New Jersey limited  
liability company, ENTANGLED PUBLISHING, LLC, a  
Delaware limited liability company, HOLTZBRINCK  
PUBLISHERS, LLC, D/B/A/ MACMILLAN, a New  
York limited liability company, UNIVERSAL CITY  
STUDIOS, LLC, a Delaware limited liability company,  
CRAZY MAPLE STUDIO, INC, a California corporation

**PLAINTIFF LYNNE  
FREEMAN'S  
INTERROGATORIES TO  
DEFENDANT  
HOLTZBRINCK  
PUBLISHERS, LLC D/B/A  
MACMILLAN, SET TWO**

FAC FILED: May 23, 2022

Defendants.

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Propounding Party: Lynne Freeman

Responding Party: Holtzbrinck Publishers, LLC d/b/a MacMillan

Set: Two

Pursuant to Federal Rule of Civil Procedure Rule 33, Plaintiff Lynne Freeman (“Freeman” or “Plaintiff”) requests that Defendant Holtzbrinck Publishers, LLC d/b/a MacMillan, answer the following interrogatories under oath and serve them upon Plaintiff within 30 days.

### **DEFINITIONS**

As used in these requests, the following terms are to be interpreted in accordance with these definitions:

- a. “YOU” and “YOUR” shall mean defendant Prospect Agency, LLC.
- b. “ACTION” shall mean this action filed in the United States District Court for the Southern District of New York (Case No. 1:22-cv-02435-AT) entitled Lynne Freeman v. Tracy Deebs-Elkenaney p/k/a Tracy Wolff et. al.
- c. “CRAVE BOOK SERIES” shall mean the books entitled Crave, Crush, Covet, Court, Charm and Cherish.
- d. “BMR” shall mean any and all versions of the manuscript that FREEMAN alleges in the First Amended Complaint that she wrote, including, but not limited to, the versions entitled *Blue Moon Rising* and *Masqued*, and she alleges was infringed by the books in the CRAVE SERIES entitled *Crave*, *Crush*, *Covet* and *Court*.
- e. “KLARIS FIRM DEFENDANTS’ ANSWER” shall mean the Answer of Prospect Agency, LLC and Emily Sylvan Kim to First Amended Complaint dated June 27, 2022 filed in this action.

### **INTERROGATORIES**

#### **INTERROGATORY NO. 21:**

With respect to each book in the CRAVE BOOK SERIES, please update your response to Interrogatory No 1 in Plaintiff Lynne Freeman’s Interrogatories to Defendant Holtzbrinck Publishers, LLC d/b/a MacMillan, Set One, to include a description of the source of the revenues,

the amount of revenues and the dates when such revenues were received or accrued by YOU in connection with each book in the CRAVE BOOK SERIES, including, but not limited to, any revenues received from any of the other Defendants in this ACTION, up to the date of YOUR response to this Interrogatory.

**INTERROGATORY NO. 22:**

With respect to each book in the CRAVE BOOK SERIES, please update your response to Interrogatory No. 2 in Plaintiff Lynne Freeman's Interrogatories to Defendant Holtzbrinck Publishers, LLC d/b/a MacMillan, Set One, to include all expenses incurred by YOU directly in connection with the writing or exploitation of each book in the CRAVE BOOK SERIES up to the date of your response to this Interrogatory, such response shall include a description of the expenses, the amount of the expenses and the date of the expenses.

**INTERROGATORY NO. 23:**

Identify by book name, format and country of sale all ISBN numbers for each book in the CRAVE BOOK SERIES.

Dated: November 29, 2022

CSReeder, P.C.  
Attorneys for Plaintiff

By:  \_\_\_\_\_

Mark D. Passin  
11766 Wilshire Blvd., Suite 1470  
Los Angeles, CA 90025  
Telephone: (310) 861-2470  
Email: [mark@csrlawyers.com](mailto:mark@csrlawyers.com)

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New York, New York 10022  
Main: 212-209-3050  
Email: [plicalsi@reiterlaw.com](mailto:plicalsi@reiterlaw.com)

**PROOF OF SERVICE**

STATE OF CALIFORNIA           )  
COUNTY OF LOS ANGELES    )   ss:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 11766 Wilshire Blvd., Suite 1470, Los Angeles, CA 90025.

On November 30, 2022 I served the foregoing document described as **PLAINTIFF LYNNE FREEMAN'S INTERROGATORIES TO DEFENDANT HOLTZBRINCK PUBLISHERS, LLC D/B/A MACMILLAN, SET TWO** on the parties in this action listed below as follows:

Nancy Wolff <a href="mailto:nwolff@cdas.com">nwolff@cdas.com</a> CeCe Cole <a href="mailto:ccole@cdas.com">ccole@cdas.com</a> <a href="#">Benjamin Halperin</a> <a href="mailto:Halperin@cdas.com">Halperin@cdas.com</a> Cowan, DeBaets, Abrahams & Sheppard LLP  Dwayne Goetzel <a href="mailto:dgoetzel@intprop.com">dgoetzel@intprop.com</a> Kowert, Hood, Munyon, Rankin & Goetzel	<i>Attorneys for Defendants,</i> TRACY DEEBs-ELKENANEY P/K/A TRACY WOLFF, ENTANGLED PUBLISHING, LLC, HOLTZBRINCK PUBLISHERS, LLC, D/B/A/ MACMILLAN, UNIVERSAL CITY STUDIOS, LLC
Lacy Herman Koonce, III <a href="mailto:lance.koonce@klarislaw.com">lance.koonce@klarislaw.com</a> Zachary M. Press <a href="mailto:zpress@klaris.com">zpress@klaris.com</a> Klaris Law	<i>Attorneys for Defendants,</i> EMILY SYLVAN KIM, PROSPECT AGENCY, LLC

☐ **BY MAIL:** By placing a true and correct copy of the above-described document(s) in envelope(s), addressed as set forth above, with first class postage pre-paid for delivery to the above-named persons at the above-listed addresses and depositing such envelopes in a US mail collection box.

☐ **BY OVER NIGHT DELIVERY, VIA FED-EX:** I gave the document(s) to our overnight courier service for delivery to the offices of the addressee, addressed as set forth above.

☐ **BY PERSONAL SERVICE, VIA FIRST LEGAL ATTORNEY SERVICE:** I gave said documents to the firm's regular attorney service with specific instructions to be personally delivered by hand to the offices of the addressee, addressed as set forth above.

☐ **BY PERSONAL SERVICE (*Ex Parte*):** I personally delivered by hand to the attorney in attendance on behalf of the above-named counsel at the hearing of \_\_\_\_\_, in Department \_\_\_\_ of the \_\_\_\_\_ Courthouse, \_\_\_\_\_, California.

☒ **BY ELECTRONIC MAIL:** I transmitted said document(s) to the person(s) shown above by electronic mail to the email address shown above.


☐ **BY FACSIMILE:** I faxed said document(s) to the addressee, at the specified fax numbers shown above.

☐ **COURTESY COPY BY ELECTRONIC MAIL:** I transmitted courtesy copies of said document(s) to the person(s) shown above by electronic mail to the email address shown above.

☐ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on November 30, 2022, at Los Angeles, California.

  
\_\_\_\_\_  
Mark D. Passin

Reitler Kailas & Rosenblatt LLC  
885 Third Avenue, 20th Floor  
New York, New York 10022  
Main: 212-209-3050  
Fax: 212-371-5500  
Email: [plicalsi@reiterlaw.com](mailto:plicalsi@reiterlaw.com)

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Email: [mark@csrlawyers.com](mailto:mark@csrlawyers.com)  
(Admission pending *pro hac vice* application)  
*Attorneys for Plaintiff Lynne Freeman*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- x

LYNNE FREEMAN, an individual,

Case No. 1:22-cv-02435-AT

Plaintiff,

-against-

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF,  
an individual, EMILY SYLVAN KIM, an individual,  
PROSPECT AGENCY, LLC, a New Jersey limited  
liability company, ENTANGLED PUBLISHING, LLC, a  
Delaware limited liability company, HOLTZBRINCK  
PUBLISHERS, LLC, D/B/A/ MACMILLAN, a New  
York limited liability company, UNIVERSAL CITY  
STUDIOS, LLC, a Delaware limited liability company,  
CRAZY MAPLE STUDIO, INC, a California corporation

**PLAINTIFF LYNNE  
FREEMAN'S  
INTERROGATORIES TO  
DEFENDANT UNIVERSAL  
CITY STUDIOS, LLC, SET  
TWO**

FAC FILED: May 23, 2022

Defendants.

----- x

Propounding Party: Lynne Freeman

Responding Party: Universal City Studios, LLC

Set: Two

Pursuant to Federal Rule of Civil Procedure Rule 33, Plaintiff Lynne Freeman (“Freeman” or “Plaintiff”) requests that Defendant Universal City Studios, LLC (hereinafter, “Defendant”), answer the following interrogatories under oath and serve them upon Plaintiff within 30 days.

### **DEFINITIONS**

As used in these requests, the following terms are to be interpreted in accordance with these definitions:

a. “UNIVERSAL” shall mean Universal Pictures, a division of Universal City Studios LLC.

b. “OPTION AGREEMENT” shall mean the Literary Option/Purchase Agreement between UNIVERSAL and Entangled Publishing LLC dated as of February 7, 2020.

### **INTERROGATORIES**

**INTERROGATORY NO. 3:** Has UNIVERSAL exercised the option for the first extension Period set forth in paragraph 3 b. of the OPTION AGREEMENT.

**INTERROGATORY NO. 4:** Has UNIVERSAL paid Entangled Publishing LLC or its agent the \$100,000 payable upon the exercise of the First Extension Payment pursuant to paragraph 4 b. of the OPTION AGREEMENT.

**INTERROGATORY NO. 5:** Has UNIVERSAL paid Entangled Publishing LLC or its agent the \$650,000 payable pursuant to paragraph 5 a. of the OPTION AGREEMENT.



**INTERROGATORY NO. 6:** How much money has UNIVERSAL paid Entangled Publishing LLC or its agent pursuant to the OPTION AGREEMENT.

**INTERROGATORY NO. 7:** With respect to YOUR answer to Interrogatory No. 6, please break down the total amount paid by identifying the paragraph number of the OPTION AGREEMENT pursuant to which any money was paid and the amount paid pursuant to each paragraph of the OPTION AGREEMENT identified.

**INTERROGATORY NO. 8:** Has principal photography of the motion picture entitled Crave commenced and., if so, when?

Dated: November 30. 2022

CSReeder, P.C.  
Attorneys for Plaintiff

By: 

Mark D. Passin  
11766 Wilshire Blvd., Suite 1470  
Los Angeles, CA 90025  
Telephone: (310) 861-2470  
Email: [mark@csrlawyers.com](mailto:mark@csrlawyers.com)

Reitler Kailas & Rosenblatt LLC

Paul LiCalsi  
885 Third Avenue, 20th Floor  
New York, New York 10022  
Main: 212-209-3050  
Email: [plicalsi@reiterlaw.com](mailto:plicalsi@reiterlaw.com)

**PROOF OF SERVICE**

STATE OF CALIFORNIA           )  
COUNTY OF LOS ANGELES    )   ss:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 11766 Wilshire Blvd., Suite 1470, Los Angeles, CA 90025.

On November 30, 2022 I served the foregoing document described as **PLAINTIFF LYNNE FREEMAN'S INTERROGATORIES TO DEFENDANT UNIVERSAL CITY STUDIOS LLC, SET TWO** on the parties in this action listed below as follows:

Nancy Wolff <a href="mailto:nwolff@cdas.com">nwolff@cdas.com</a> CeCe Cole <a href="mailto:ccole@cdas.com">ccole@cdas.com</a> <a href="#">Benjamin Halperin</a> <a href="mailto:Halperin@cdas.com">Halperin@cdas.com</a> Cowan, DeBaets, Abrahams & Sheppard LLP  Dwayne Goetzel <a href="mailto:dgoetzel@intprop.com">dgoetzel@intprop.com</a> Kowert, Hood, Munyon, Rankin & Goetzel	<i>Attorneys for Defendants,</i> TRACY DEEBs-ELKENANEY P/K/A TRACY WOLFF, ENTANGLED PUBLISHING, LLC, HOLTZBRINCK PUBLISHERS, LLC, D/B/A/ MACMILLAN, UNIVERSAL CITY STUDIOS, LLC
Lacy Herman Koonce, III <a href="mailto:lance.koonce@klarislaw.com">lance.koonce@klarislaw.com</a> Zachary M. Press <a href="mailto:zpress@klaris.com">zpress@klaris.com</a> Klaris Law	<i>Attorneys for Defendants,</i> EMILY SYLVAN KIM, PROSPECT AGENCY, LLC

☐ **BY MAIL:** By placing a true and correct copy of the above-described document(s) in envelope(s), addressed as set forth above, with first class postage pre-paid for delivery to the above-named persons at the above-listed addresses and depositing such envelopes in a US mail collection box.

☐ **BY OVER NIGHT DELIVERY, VIA FED-EX:** I gave the document(s) to our overnight courier service for delivery to the offices of the addressee, addressed as set forth above.

☐ **BY PERSONAL SERVICE, VIA FIRST LEGAL ATTORNEY SERVICE:** I gave said documents to the firm's regular attorney service with specific instructions to be personally delivered by hand to the offices of the addressee, addressed as set forth above.

☐ **BY PERSONAL SERVICE (*Ex Parte*):** I personally delivered by hand to the attorney in attendance on behalf of the above-named counsel at the hearing of \_\_\_\_\_, in Department \_\_\_\_ of the \_\_\_\_\_ Courthouse, \_\_\_\_\_, California.

☒ **BY ELECTRONIC MAIL:** I transmitted said document(s) to the person(s) shown above by electronic mail to the email address shown above.

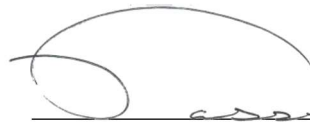
☐ **BY FACSIMILE:** I faxed said document(s) to the addressee, at the specified fax numbers shown above.

☐ **COURTESY COPY BY ELECTRONIC MAIL:** I transmitted courtesy copies of said document(s) to the person(s) shown above by electronic mail to the email address shown above.

☐ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on November 30, 2022, at Los Angeles, California.

  
\_\_\_\_\_  
Mark D. Passin

Reitler Kailas & Rosenblatt LLC  
885 Third Avenue, 20th Floor  
New York, New York 10022  
Main: 212-209-3050  
Fax: 212-371-5500  
Email: [plicalsi@reiterlaw.com](mailto:plicalsi@reiterlaw.com)

CSReeder, PC  
11766 Wilshire Blvd., Suite 1470  
Los Angeles, CA 90025  
Telephone: (310) 861-2470  
Facsimile: (310) 861-2476  
Email: [mark@csrlawyers.com](mailto:mark@csrlawyers.com)  
(Admission pending *pro hac vice* application)  
*Attorneys for Plaintiff Lynne Freeman*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- x

LYNNE FREEMAN, an individual,

Plaintiff,

-against-

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF,  
an individual, EMILY SYLVAN KIM, an individual,  
PROSPECT AGENCY, LLC, a New Jersey limited  
liability company, ENTANGLED PUBLISHING, LLC, a  
Delaware limited liability company, HOLTZBRINCK  
PUBLISHERS, LLC, D/B/A/ MACMILLAN, a New  
York limited liability company, UNIVERSAL CITY  
STUDIOS, LLC, a Delaware limited liability company,  
CRAZY MAPLE STUDIO, INC, a California corporation

Defendants.

----- -x

Propounding Party: Plaintiff Lynne Freeman

Responding Parties: Defendants Prospect Agency, LLC,  
Emily Sylvan Kim, Entangled Publishing, LLC, Tracy  
Deebs-Elkananey p/k/a Tracy Wolff and Holtzbrink  
Publishers, LLC d/b/a Macmillan and Universal City  
Studios, Inc.

Set: Three

Case No. 1:22-cv-02435-LLS

**PLAINTIFF LYNNE  
FREEMAN'S REQUEST  
FOR PRODUCTION OF  
DOCUMENTS TO  
DEFENDANTS PROSPECT  
AGENCY, LLC, EMILY  
SYLVAN KIM,  
ENTANGLED  
PUBLISHING, LLC,  
TRACY DEEBS-  
ELKENANEY P/K/A  
TRACY WOLFF AND  
HOLTZBRINCK  
PUBLISHERS, LLC D/B/A  
MACMILLAN, AND  
UNIVERSAL CITY  
STUDIOS, LLC, SET  
THREE**

Assigned to the Hon. Louis L  
Stanton

FAC FILED: May 23, 2022

Pursuant to Federal Rule of Civil Procedure Rule 34, Defendants Prospect Agency, LLC Emily Sylvan Kim, Entangled Publishing, LLC, Tracy Deebs-Elkenaney p/k/a Tracy Wolff, Holtzbrink Publishers, LLC d/b/a Macmillan and Universal City Studios, Inc., are hereby requested to serve within thirty (30) days a written response under oath to the following requests and to produce those documents identified in response to Plaintiff Lynne Freeman's ("Freeman" or "Plaintiff") requests for production of documents to Paul LiCalsi, Esq. at the law firm of Reitler Kailas & Rosenblatt LLC, 885 Third Avenue, 20<sup>th</sup> Floor, New York, New York 10022.

Your written responses shall state with respect to each item or category, that inspection-related activities will be permitted as requested, unless request is refused, in which event the reasons for refusal shall be stated. If the refusal relates to part of an item or category, that part shall be specified. If any refusal is made on the basis of attorney client privilege, you shall supply the information required by Local Rule 26.2. To the extent that any request calls for the production of electronically stored information, Plaintiff requests that all documents be produced in native format with all Metadata, including, without limitation, document level text, file and custodian names and document dates, sent and received dates, sender and recipient information, and an accompanying load file (in .dat, .opt, or lfp format).

### **DEFINITIONS**

As used in these requests, the following terms are to be interpreted in accordance with these definitions:

- A. "FREEMAN" shall mean plaintiff Lynne Freeman.
- B. "KIM" shall mean defendant Emily Sylvan Kim.

C. “PROSPECT” shall mean defendant Prospect Agency, LLC. and, where applicable, its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates

D. “WOLFF” shall mean defendant Tracy Deeks-Elkenaney p/k/a Tracy Wolff.

E. “ENTANGLED” shall mean defendant Entangled Publishing, LLC and, where applicable, its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates.

F. “MACMILLAN” shall mean defendant Holtzbrinck Publishers, LLC, d/b/a Macmillan and, where applicable, its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates.

G. “UNIVERSAL” shall mean defendant Universal City Studios, LLC. and, where applicable, its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates.

H. “YOU” shall mean collectively PROSPECT, KIM, ENTANGLED, WOLFF, MACMILLAN and UNIVERSAL.

I. “CRAZY MAPLE STUDIO” shall mean defendant Crazy Maple Studio, Inc. and, where applicable, its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates.

J. “PELLETIER” shall mean Liz Pelletier of ENTANGLED as well as any attorney, manager, agent or other person or entity acting on behalf of Liz Pelletier.

K. “DOCUMENTS” shall have the meaning set forth in Local Rule 26.3(c) for the word “document.”

L. “COMMUNICATIONS” shall have the meaning set forth in Local Rules 26.3(c) of the Local Rules for the word “communication.”

M. “CRAVE BOOK SERIES” shall mean the books entitled Crave, Crush, Covet, Court, Charm and Cherish.

N. “PERSON” shall have the meaning set forth in Local Rule 26.3(c).

O. “CONCERNING” shall have the meaning set forth in Local Rule 26.3(c).

P. “FAC” shall mean the First Amended Complaint filed in this action on May 23, 2022.

Q. “BMR” shall mean any and all versions of the manuscript that FREEMAN alleges in the FAC she wrote, including, but not limited to, the versions entitled *Blue Moon Rising* and *Masqued*, and she alleges was infringed by the books in the CRAVE SERIES entitled *Crave*, *Crush*, *Covet* and *Court*.

R. “COWAN FIRM DEFENDANTS’ ANSWER” shall mean the Answer and Affirmative Defenses of the of Tracy Deeks-Elkananey p/k/a Tracy Wolff, Entangled Publishing, LLC, Holtzbrink Publishers, LLC, d/b/a Macmillan and Universal City Studios, LLC dated June 27, 2022 filed in this action.

S. “KLARIS FIRM DEFENDANTS’ ANSWER shall mean the Answer of Prospect Agency, LLC and Emily Sylvan Kim to First Amended Complaint dated June 27, 2022 filed in this action.

### **INSTRUCTIONS**

1. In responding to each Request set forth below, quote each Request for Production before each Response to that Request for Production.

2. In responding to each Request for Production set forth below, the DOCUMENT produced must indicate the Request for Production number to which it is responsive.

3. With respect to any DOCUMENT responsive to these requests for Production that YOU contend YOU are not required to produce because of an alleged privilege, please provide the information required by Local Rule 26.2.

### **DOCUMENT REQUESTS**

1. All COMMUNICATIONS to or from Carrie Pestritto CONCERNING the development or submission to any PERSON of BMR.
2. All COMMUNICATIONS to or from Lynn Vande Stouwe CONCERNING the development of BMR.
3. All COMMUNICATIONS to or from Ellen Brescia CONCERNING the development or submission to any PERSON of BMR.
4. All COMMUNICATIONS to or from Whitney Lee CONCERNING the submission to any PERSON OF BMR.
5. All agreements between PROSPECT and/or KIM, on the one hand, and WOLFF, on the other hand.
6. All COMMUNICATIONS between KIM and WOLFF CONCERNING WOLFF paying PROSPECT or KIM any money in connection with any of the books in the CRAVE BOOK SERIES.
7. All editing software, including, but not limited to, any software relating to bots.

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Dated: November 30, 2022

Reitler Kailas & Rosenblatt LLC  
Attorneys for Plaintiff

By:   
\_\_\_\_\_

Mark D. Passin  
11766 Wilshire Blvd., Suite 1470  
Los Angeles, CA 90025  
Telephone: (310) 861-2470  
Email: [mark@csrlawyers.com](mailto:mark@csrlawyers.com)

Paul LiCalsi  
885 Third Avenue, 20th Floor  
New York, New York 10022  
Telephone: 212-209-3050  
Email: [plicalsi@reiterlaw.com](mailto:plicalsi@reiterlaw.com)

**PROOF OF SERVICE**

STATE OF CALIFORNIA            )  
COUNTY OF LOS ANGELES    )   ss:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 11766 Wilshire Blvd., Suite 1470, Los Angeles, CA 90025.

On November 30, 2022 I served the foregoing document described as **PLAINTIFF LYNNE FREEMAN’S REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS PROSPECT AGENCY, LLC, EMILY SYLVAN KIM, ENTANGLED PUBLISHING, LLC, TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF AND HOLTZBRINCK PUBLISHERS, LLC D/B/A MACMILLAN AND UNIVERSAL CITY STUDIOS, LLC SET THREE** on the parties in this action listed below as follows:

Nancy Wolff <a href="mailto:nwolff@cdas.com">nwolff@cdas.com</a> CeCe Cole <a href="mailto:ccole@cdas.com">ccole@cdas.com</a> Cowan, DeBaets, Abrahams & Sheppard LLP  Dwayne Goetzel <a href="mailto:dgoetzel@intprop.com">dgoetzel@intprop.com</a> Kowert, Hood, Munyon, Rankin & Goetzel	<i>Attorneys for Defendants,</i> TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF, ENTANGLED PUBLISHING, LLC, HOLTZBRINCK PUBLISHERS, LLC, D/B/A/ MACMILLAN, UNIVERSAL CITY STUDIOS, LLC
Lacy Herman Koonce, III <a href="mailto:lance.koonce@klarislaw.com">lance.koonce@klarislaw.com</a> Zachary M. Press <a href="mailto:zpress@mkslex.com">zpress@mkslex.com</a> Klaris Law	<i>Attorneys for Defendants,</i> EMILY SYLVAN KIM, PROSPECT AGENCY, LLC

☐ **BY MAIL:** By placing a true and correct copy of the above-described document(s) in envelope(s), addressed as set forth above, with first class postage pre-paid for delivery to the above-named persons at the above-listed addresses and depositing such envelopes in a US mail collection box.

☐ **BY OVER NIGHT DELIVERY, VIA FED-EX:** I gave the document(s) to our overnight courier service for delivery to the offices of the addressee, addressed as set forth above.

☐ **BY PERSONAL SERVICE, VIA FIRST LEGAL ATTORNEY SERVICE:** I gave said documents to the firm’s regular attorney service with specific instructions to be personally delivered by hand to the offices of the addressee, addressed as set forth above.

☐ **BY PERSONAL SERVICE (*Ex Parte*):** I personally delivered by hand to the attorney in attendance on behalf of the above-named counsel at the hearing of \_\_\_\_\_, in Department \_\_\_\_ of the \_\_\_\_\_ Courthouse, \_\_\_\_\_, California.

☒ **BY ELECTRONIC MAIL:** I transmitted said document(s) to the person(s) shown above by electronic mail to the email address shown above.


☐ **BY FACSIMILE:** I faxed said document(s) to the addressee, at the specified fax numbers shown above.

☐ **COURTESY COPY BY ELECTRONIC MAIL:** I transmitted courtesy copies of said document(s) to the person(s) shown above by electronic mail to the email address shown above.

☐ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on November 30, 2022, at Los Angeles, California.

  
\_\_\_\_\_  
Mark D. Passin

Reitler Kailas & Rosenblatt LLC  
885 Third Avenue, 20th Floor  
New York, New York 10022  
Main: 212-209-3050  
Fax: 212-371-5500  
Email: [plicalsi@reiterlaw.com](mailto:plicalsi@reiterlaw.com)

CSReeder, PC  
11766 Wilshire Blvd., Suite 1470  
Los Angeles, CA 90025  
Telephone: (310) 861-2470  
Facsimile: (310) 861-2476  
Email: [mark@csrlawyers.com](mailto:mark@csrlawyers.com)  
(Admission pending *pro hac vice* application)  
*Attorneys for Plaintiff Lynne Freeman*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- x

LYNNE FREEMAN, an individual,

Case No. 1:22-cv-02435-LIS

Plaintiff,

-against-

**PLAINTIFF LYNNE  
FREEMAN'S  
INTERROGATORIES TO  
DEFENDANT PROSPECT  
AGENCY, LLC SET FOUR**

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF,  
an individual, EMILY SYLVAN KIM, an individual,  
PROSPECT AGENCY, LLC, a New Jersey limited  
liability company, ENTANGLED PUBLISHING, LLC, a  
Delaware limited liability company, HOLTZBRINCK  
PUBLISHERS, LLC, D/B/A/ MACMILLAN, a New  
York limited liability company, UNIVERSAL CITY  
STUDIOS, LLC, a Delaware limited liability company,  
CRAZY MAPLE STUDIO, INC, a California corporation

FAC FILED: May 23, 2022

Defendants.

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Propounding Party: Lynne Freeman

Responding Party: Prospect Agency, LLC

Set: FOUR

Pursuant to Federal Rule of Civil Procedure Rule 33, Plaintiff Lynne Freeman (“Freeman” or “Plaintiff”) requests that Defendant Prospect Agency, LLC, answer the following interrogatories under oath and serve them upon Plaintiff within 30 days.

### **DEFINITIONS**

As used in these requests, the following terms are to be interpreted in accordance with these definitions:

- a. “YOU” and “YOUR” shall mean defendant Prospect Agency, LLC.
- b. “ACTION” shall mean this action filed in the United States District Court for the Southern District of New York (Case No. 1:22-cv-02435-AT) entitled Lynne Freeman v. Tracy Deebs-Elkenaney p/k/a Tracy Wolff et. al.
- c. “CRAVE BOOK SERIES” shall mean the books entitled Crave, Crush, Covet, Court, Charm and Cherish.
- d. “BMR” shall mean any and all versions of the manuscript that FREEMAN alleges in the First Amended Complaint that she wrote, including, but not limited to, the versions entitled *Blue Moon Rising* and *Masqued*, and she alleges was infringed by the books in the CRAVE SERIES entitled *Crave*, *Crush*, *Covet* and *Court*.
- e. “KLARIS FIRM DEFENDANTS’ ANSWER” shall mean the Answer of Prospect Agency, LLC and Emily Sylvan Kim to First Amended Complaint dated June 27, 2022 filed in this action.

### **INTERROGATORIES**

#### **INTERROGATORY NO. 21:**

With respect to each book in the CRAVE BOOK SERIES, please update your response to Interrogatory No 3 in Plaintiff Lynne Freeman’s Interrogatories to Defendant Prospect Agency, LLC Set One, to include a description of the source of the revenues, the amount of revenues and the dates when such revenues were received or accrued by YOU in connection with each book in

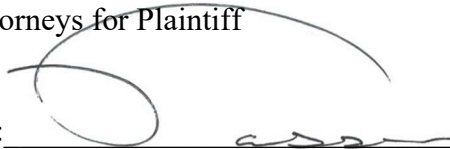
the CRAVE BOOK SERIES, including, but not limited to, any revenues received from any of the other Defendants in this ACTION, up to the date of YOUR response to this Interrogatory.

**INTERROGATORY NO. 22:**

With respect to each book in the CRAVE BOOK SERIES, please update your response to Interrogatory No. 4 in Plaintiff Lynne Freeman's Interrogatories to Defendant Prospect agency, LLC, Set One, to include all expenses incurred by YOU directly in connection with the writing or exploitation of each book in the CRAVE BOOK SERIES up to the date of your response to this Interrogatory, such response shall include a description of the expenses, the amount of the expenses and the date of the expenses.

Dated: November 29, 2022

CSReeder, P.C.  
Attorneys for Plaintiff

By:  \_\_\_\_\_

Mark D. Passin  
11766 Wilshire Blvd., Suite 1470  
Los Angeles, CA 90025  
Telephone: (310) 861-2470  
Email: mark@csrlawyers.com

Reitler Kailas & Rosenblatt LLC  
Paul LiCalsi  
885 Third Avenue, 20th Floor  
New York, New York 10022  
Main: 212-209-3050  
Email: [plicalsi@reiterlaw.com](mailto:plicalsi@reiterlaw.com)

**PROOF OF SERVICE**

STATE OF CALIFORNIA            )  
COUNTY OF LOS ANGELES    )   ss:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 11766 Wilshire Blvd., Suite 1470, Los Angeles, CA 90025.

On November 30, 2022 I served the foregoing document described as **PLAINTIFF LYNNE FREEMAN'S INTERROGATORIES TO DEFENDANT PROSPECT AGENCY, LLC, SET THREE** on the parties in this action listed below as follows:

Nancy Wolff <a href="mailto:nwolff@cdas.com">nwolff@cdas.com</a> CeCe Cole <a href="mailto:ccole@cdas.com">ccole@cdas.com</a> Benjamin Halperin <a href="mailto:BHalperin@cdas.com">BHalperin@cdas.com</a> Cowan, DeBaets, Abrahams & Sheppard LLP  Dwayne Goetzel <a href="mailto:dgoetzel@intprop.com">dgoetzel@intprop.com</a> Kowert, Hood, Munyon, Rankin & Goetzel	<i>Attorneys for Defendants,</i> TRACY DEEBs-ELKENANEY P/K/A TRACY WOLFF, ENTANGLED PUBLISHING, LLC, HOLTZBRINCK PUBLISHERS, LLC, D/B/A/ MACMILLAN, UNIVERSAL CITY STUDIOS, LLC
Lacy Herman Koonce, III <a href="mailto:lance.koonce@klarislaw.com">lance.koonce@klarislaw.com</a> Zachary M. Press <a href="mailto:zpress@klaris.com">zpress@klaris.com</a> Klaris Law	<i>Attorneys for Defendants,</i> EMILY SYLVAN KIM, PROSPECT AGENCY, LLC

☐ **BY MAIL:** By placing a true and correct copy of the above-described document(s) in envelope(s), addressed as set forth above, with first class postage pre-paid for delivery to the above-named persons at the above-listed addresses and depositing such envelopes in a US mail collection box.

☐ **BY OVER NIGHT DELIVERY, VIA FED-EX:** I gave the document(s) to our overnight courier service for delivery to the offices of the addressee, addressed as set forth above.

☐ **BY PERSONAL SERVICE, VIA FIRST LEGAL ATTORNEY SERVICE:** I gave said documents to the firm's regular attorney service with specific instructions to be personally delivered by hand to the offices of the addressee, addressed as set forth above.

☐ **BY PERSONAL SERVICE (*Ex Parte*):** I personally delivered by hand to the attorney in attendance on behalf of the above-named counsel at the hearing of \_\_\_\_\_, in Department \_\_\_\_ of the \_\_\_\_\_ Courthouse, \_\_\_\_\_, California.

☒ **BY ELECTRONIC MAIL:** I transmitted said document(s) to the person(s) shown above by electronic mail to the email address shown above.

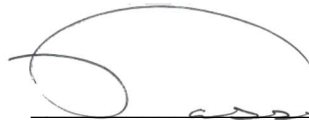
☐ **BY FACSIMILE:** I faxed said document(s) to the addressee, at the specified fax numbers shown above.

☐ **COURTESY COPY BY ELECTRONIC MAIL:** I transmitted courtesy copies of said document(s) to the person(s) shown above by electronic mail to the email address shown above.

☐ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on November 30, 2022, at Los Angeles, California.

  
\_\_\_\_\_  
Mark D. Passin



Reitler Kailas & Rosenblatt LLC  
885 Third Avenue, 20th Floor  
New York, New York 10022  
Main: 212-209-3050  
Fax: 212-371-5500  
Email: [plicalsi@reiterlaw.com](mailto:plicalsi@reiterlaw.com)

CSReeder, PC  
11766 Wilshire Blvd., Suite 1470  
Los Angeles, CA 90025  
Telephone: (310) 861-2470  
Facsimile: (310) 861-2476  
Email: [mark@csrlawyers.com](mailto:mark@csrlawyers.com)  
(Admission pending *pro hac vice* application)  
*Attorneys for Plaintiff Lynne Freeman*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- x

LYNNE FREEMAN, an individual,

Case No. 1:22-cv-02435-LIS

Plaintiff,

-against-

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF,  
an individual, EMILY SYLVAN KIM, an individual,  
PROSPECT AGENCY, LLC, a New Jersey limited  
liability company, ENTANGLED PUBLISHING, LLC, a  
Delaware limited liability company, HOLTZBRINCK  
PUBLISHERS, LLC, D/B/A/ MACMILLAN, a New  
York limited liability company, UNIVERSAL CITY  
STUDIOS, LLC, a Delaware limited liability company,  
CRAZY MAPLE STUDIO, INC, a California corporation

**PLAINTIFF LYNNE  
FREEMAN'S  
INTERROGATORIES TO  
DEFENDANT  
ENTANGLED  
PUBLISHING, LLC, SET  
FIVE**

FAC FILED: May 23, 2022

Defendants.

----- x

Propounding Party: Lynne Freeman

Responding Party: Entangled Publishing, LLC

Set: FIVE

Pursuant to Federal Rule of Civil Procedure Rule 33, Plaintiff Lynne Freeman (“Freeman” or “Plaintiff”) requests that Defendant Entangled Publishing, LLC, answer the following interrogatories under oath and serve them upon Plaintiff within 30 days.

### **DEFINITIONS**

As used in these requests, the following terms are to be interpreted in accordance with these definitions:

- a. “YOU” and “YOUR” shall mean defendant Entangled Publishing, LLC.
- b. “ACTION” shall mean this action filed in the United States District Court for the Southern District of New York (Case No. 1:22-cv-02435-AT) entitled Lynne Freeman v. Tracy Deebs-Elkenaney p/k/a Tracy Wolff et. al.
- c. “CRAVE BOOK SERIES” shall mean the books entitled Crave, Crush, Covet, Court, Charm and Cherish.
- d. “BMR” shall mean any and all versions of the manuscript that FREEMAN alleges in the First Amended Complaint filed in the Action that she wrote, including, but not limited to, the versions entitled *Blue Moon Rising* and *Masqued*, and she alleges was infringed by the books in the CRAVE SERIES entitled *Crave*, *Crush*, *Covet* and *Court*.
- e. “COWAN FIRM DEFENDANTS’ ANSWER” shall mean the Answer and Affirmative Defenses of the of Tracy Deebs-Elkananey p/k/a Tracy Wolff, Entangled Publishing, LLC, Holtzbrink Publishers, LLC, d/b/a Macmillan and Universal City Studios, LLC dated June 27, 2022 filed in this ACTION.

**INTERROGATORIES**

**INTERROGATORY NO. 22:**

Identify by book name, format and country of sale all ISBN numbers for each book in the CRAVE BOOK SERIES.

**INTERROGATORY NO. 23:**

With respect to each book in the CRAVE BOOK SERIES, please update your response to Interrogatory No 3 in Plaintiff Lynne Freeman's Interrogatories to Defendant Entangled Publishing, LLC, Set One, to include a description of the source of the revenues, the amount of revenues and the dates when such revenues were received or accrued by YOU in connection with each book in the CRAVE BOOK SERIES, including, but not limited to, any revenues received from any of the other Defendants in this ACTION, up to the date of YOUR response to this Interrogatory.

**INTERROGATORY NO. 24:**

With respect to each book in the CRAVE BOOK SERIES, please update your response to Interrogatory No. 4 in Plaintiff Lynne Freeman's Interrogatories to Defendant Entangled Publishing LLC, Set One, to include all expenses incurred by YOU directly in connection with the writing or exploitation of each book in the CRAVE BOOK SERIES up to the date of your response to this Interrogatory, such response shall include a description of the expenses, the amount of the expenses and the date of the expenses.

Dated: November 29, 2022

CSReeder, P.C.  
Attorneys for Plaintiff

By:  \_\_\_\_\_

Mark D. Passin  
11766 Wilshire Blvd., Suite 1470  
Los Angeles, CA 90025  
Telephone: (310) 861-2470  
Email: [mark@csrlawyers.com](mailto:mark@csrlawyers.com)

Reitler Kailas & Rosenblatt LLC  
Paul LiCalsi  
885 Third Avenue, 20th Floor  
New York, New York 10022  
Main: 212-209-3050  
Email: [plicalsi@reiterlaw.com](mailto:plicalsi@reiterlaw.com)

**PROOF OF SERVICE**

STATE OF CALIFORNIA            )  
COUNTY OF LOS ANGELES    )   ss:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 11766 Wilshire Blvd., Suite 1470, Los Angeles, CA 90025.

On November 30, 2022 I served the foregoing document described as **PLAINTIFF LYNNE FREEMAN'S INTERROGATORIES TO ENTANGLED PUBLISHING, LLC, SET FIVE** on the parties in this action listed below as follows:

Nancy Wolff <a href="mailto:nwolff@cdas.com">nwolff@cdas.com</a> CeCe Cole <a href="mailto:ccole@cdas.com">ccole@cdas.com</a> <a href="mailto:BHalperin@cdas.com">BHalperin@cdas.com</a> Benjamin Halperin Cowan, DeBaets, Abrahams & Sheppard LLP  Dwayne Goetzel <a href="mailto:dgoetzel@intprop.com">dgoetzel@intprop.com</a> Kowert, Hood, Munyon, Rankin & Goetzel	<i>Attorneys for Defendants,</i> TRACY DEEBs-ELKENANEY P/K/A TRACY WOLFF, ENTANGLED PUBLISHING, LLC, HOLTZBRINCK PUBLISHERS, LLC, D/B/A/ MACMILLAN, UNIVERSAL CITY STUDIOS, LLC
Lacy Herman Koonce, III <a href="mailto:lance.koonce@klarislaw.com">lance.koonce@klarislaw.com</a> Zachary M. Press <a href="mailto:zpress@klarislaw.com">zpress@klarislaw.com</a> Klaris Law	<i>Attorneys for Defendants,</i> EMILY SYLVAN KIM, PROSPECT AGENCY, LLC

☐ **BY MAIL:** By placing a true and correct copy of the above-described document(s) in envelope(s), addressed as set forth above, with first class postage pre-paid for delivery to the above-named persons at the above-listed addresses and depositing such envelopes in a US mail collection box.

☐ **BY OVER NIGHT DELIVERY, VIA FED-EX:** I gave the document(s) to our overnight courier service for delivery to the offices of the addressee, addressed as set forth above.

☐ **BY PERSONAL SERVICE, VIA FIRST LEGAL ATTORNEY SERVICE:** I gave said documents to the firm's regular attorney service with specific instructions to be personally delivered by hand to the offices of the addressee, addressed as set forth above.

☐ **BY PERSONAL SERVICE (*Ex Parte*):** I personally delivered by hand to the attorney in attendance on behalf of the above-named counsel at the hearing of \_\_\_\_\_, in Department \_\_\_\_ of the \_\_\_\_\_ Courthouse, \_\_\_\_\_, California.

☒ **BY ELECTRONIC MAIL:** I transmitted said document(s) to the person(s) shown above by electronic mail to the email address shown above.

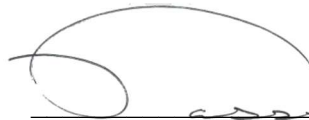
☐ **BY FACSIMILE:** I faxed said document(s) to the addressee, at the specified fax numbers shown above.

☐ **COURTESY COPY BY ELECTRONIC MAIL:** I transmitted courtesy copies of said document(s) to the person(s) shown above by electronic mail to the email address shown above.

☐ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on November 30, 2022, at Los Angeles, California.

  
\_\_\_\_\_  
Mark D. Passin

Reitler Kailas & Rosenblatt LLC  
885 Third Avenue, 20th Floor  
New York, New York 10022  
Main: 212-209-3050  
Fax: 212-371-5500  
Email: [plicalsi@reiterlaw.com](mailto:plicalsi@reiterlaw.com)

CSReeder, PC  
11766 Wilshire Blvd., Suite 1470  
Los Angeles, CA 90025  
Telephone: (310) 861-2470  
Facsimile: (310) 861-2476  
Email: [mark@csrlawyers.com](mailto:mark@csrlawyers.com)  
(Admission pending *pro hac vice* application)  
*Attorneys for Plaintiff Lynne Freeman*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- x

LYNNE FREEMAN, an individual,

Case No. 1:22-cv-02435-LIS

Plaintiff,

-against-

**PLAINTIFF LYNNE  
FREEMAN'S  
INTERROGATORIES TO  
DEFENDANT EMILY  
SYLVAN KIM, SET FIVE**

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF,  
an individual, EMILY SYLVAN KIM, an individual,  
PROSPECT AGENCY, LLC, a New Jersey limited  
liability company, ENTANGLED PUBLISHING, LLC, a  
Delaware limited liability company, HOLTZBRINCK  
PUBLISHERS, LLC, D/B/A/ MACMILLAN, a New  
York limited liability company, UNIVERSAL CITY  
STUDIOS, LLC, a Delaware limited liability company,  
CRAZY MAPLE STUDIO, INC, a California corporation

FAC FILED: May 23, 2022

Defendants.

----- x

Propounding Party: Lynne Freeman

Responding Party: EMILY SYLVAN KIM

Set: FIVE

Pursuant to Federal Rule of Civil Procedure Rule 33, Plaintiff Lynne Freeman (“Freeman” or “Plaintiff”) requests that Defendant Emily Sylvan Kim, answer the following interrogatories under oath and serve them upon Plaintiff within 30 days.

### **DEFINITIONS**

As used in these requests, the following terms are to be interpreted in accordance with these definitions:

- a. “YOU” and “YOUR” shall mean defendant Emily Sylvan Kim.
- b. “ACTION” shall mean this action filed in the United States District Court for the Southern District of New York (Case No. 1:22-cv-02435-AT) entitled Lynne Freeman v. Tracy Deebs-Elkenaney p/k/a Tracy Wolff et. al.
- c. “CRAVE BOOK SERIES” shall mean the books entitled *Crave*, *Crush*, *Covet*, *Court*, *Charm* and *Cherish*.
- d. “BMR” shall mean any and all versions of the manuscript that FREEMAN alleges in the First Amended Complaint that she wrote, including, but not limited to, the versions entitled *Blue Moon Rising* and *Masqued*, and she alleges was infringed by the books in the CRAVE SERIES entitled *Crave*, *Crush*, *Covet* and *Court*.
- e. “KLARIS FIRM DEFENDANTS’ ANSWER” shall mean the Answer of Prospect Agency, LLC and Emily Sylvan Kim to First Amended Complaint dated June 27, 2022 filed in this action.

### **INTERROGATORIES**

#### **INTERROGATORY NO. 22:**

With respect to each book in the CRAVE BOOK SERIES, please update your response to Interrogatory No 3 in Plaintiff Lynne Freeman’s Interrogatories to Defendant Emily Sylvan, Kim Set One, to include a description of the source of the revenues, the amount of revenues and the dates when such revenues were received or accrued by YOU in connection with each book in the



CRAVE BOOK SERIES, including, but not limited to, any revenues received from any of the other Defendants in this ACTION, up to the date of YOUR response to this Interrogatory.

**INTERROGATORY NO. 23:**

With respect to each book in the CRAVE BOOK SERIES, please update your response to Interrogatory No. 4 in Plaintiff Lynne Freeman's Interrogatories to Defendant Emily Sylvan Kim, Set One, to include all expenses incurred by YOU directly in connection with the writing or exploitation of each book in the CRAVE BOOK SERIES up to the date of your response to this Interrogatory, such response shall include a description of the expenses, the amount of the expenses and the date of the expenses.

Dated: November 29, 2022

CSReeder, P.C.  
Attorneys for Plaintiff

By:  \_\_\_\_\_

Mark D. Passin  
11766 Wilshire Blvd., Suite 1470  
Los Angeles, CA 90025  
Telephone: (310) 861-2470  
Email: [mark@csrlawyers.com](mailto:mark@csrlawyers.com)

Reitler Kailas & Rosenblatt LLC  
Paul LiCalsi  
885 Third Avenue, 20th Floor  
New York, New York 10022  
Main: 212-209-3050  
Email: [plicalsi@reiterlaw.com](mailto:plicalsi@reiterlaw.com)

**PROOF OF SERVICE**

STATE OF CALIFORNIA            )  
COUNTY OF LOS ANGELES    )   ss:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 11766 Wilshire Blvd., Suite 1470, Los Angeles, CA 90025.

On November 30, 2022 I served the foregoing document described as **PLAINTIFF LYNNE FREEMAN'S INTERROGATORIES TO DEFENDANT EMILY SYLVAN KIM, SET FIVE** on the parties in this action listed below as follows:

Nancy Wolff <a href="mailto:nwolff@cdas.com">nwolff@cdas.com</a> CeCe Cole <a href="mailto:ccole@cdas.com">ccole@cdas.com</a> <a href="#">Benjamin Halperin</a> BHalperin@cdas.com Cowan, DeBaets, Abrahams & Sheppard LLP  Dwayne Goetzel <a href="mailto:dgoetzel@intprop.com">dgoetzel@intprop.com</a> Kowert, Hood, Munyon, Rankin & Goetzel	<i>Attorneys for Defendants,</i> TRACY DEEBs-ELKENANEY P/K/A TRACY WOLFF, ENTANGLED PUBLISHING, LLC, HOLTZBRINCK PUBLISHERS, LLC, D/B/A/ MACMILLAN, UNIVERSAL CITY STUDIOS, LLC
Lacy Herman Koonce, III <a href="mailto:lance.koonce@klarislaw.com">lance.koonce@klarislaw.com</a> Zachary M. Press <a href="mailto:zpress@klarislaw.com">zpress@klarislaw.com</a> Klaris Law	<i>Attorneys for Defendants,</i> EMILY SYLVAN KIM, PROSPECT AGENCY, LLC
Eric Plourde <a href="mailto:eric.plourde@procopio.com">eric.plourde@procopio.com</a> Jack Shaw <a href="mailto:jack.shaw@procopio.com">jack.shaw@procopio.com</a> Procopio, Cory, Hargreaves & Savitch LLP	<i>Attorneys for Defendant,</i> CRAZY MAPLE STUDIO, INC

☐ **BY MAIL:** By placing a true and correct copy of the above-described document(s) in envelope(s), addressed as set forth above, with first class postage pre-paid for delivery to the above-named persons at the above-listed addresses and depositing such envelopes in a US mail collection box.

☐ **BY OVER NIGHT DELIVERY, VIA FED-EX:** I gave the document(s) to our overnight courier service for delivery to the offices of the addressee, addressed as set forth above.

☐ **BY PERSONAL SERVICE, VIA FIRST LEGAL ATTORNEY SERVICE:** I gave said documents to the firm's regular attorney service with specific instructions to be personally delivered by hand to the offices of the addressee, addressed as set forth above.

☐ **BY PERSONAL SERVICE (*Ex Parte*):** I personally delivered by hand to the attorney in attendance on behalf of the above-named counsel at the hearing of \_\_\_\_\_, in Department \_\_\_\_ of the \_\_\_\_\_ Courthouse, \_\_\_\_\_, California.

☒ **BY ELECTRONIC MAIL:** I transmitted said document(s) to the person(s) shown above by electronic mail to the email address shown above.


☐ **BY FACSIMILE:** I faxed said document(s) to the addressee, at the specified fax numbers shown above.

☐ **COURTESY COPY BY ELECTRONIC MAIL:** I transmitted courtesy copies of said document(s) to the person(s) shown above by electronic mail to the email address shown above.

☐ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on November 30, 2022, at Los Angeles, California.

  
\_\_\_\_\_  
Mark D. Passin

Reitler Kailas & Rosenblatt LLC  
885 Third Avenue, 20th Floor  
New York, New York 10022  
Main: 212-209-3050  
Fax: 212-371-5500  
Email: [plicalsi@reiterlaw.com](mailto:plicalsi@reiterlaw.com)

CSReeder, PC  
11766 Wilshire Blvd., Suite 1470  
Los Angeles, CA 90025  
Telephone: (310) 861-2470  
Facsimile: (310) 861-2476  
Email: [mark@csrlawyers.com](mailto:mark@csrlawyers.com)  
(Admission pending *pro hac vice* application)  
*Attorneys for Plaintiff Lynne Freeman*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- x

LYNNE FREEMAN, an individual,

Case No. 1:22-cv-02435-LIS

Plaintiff,

-against-

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF,  
an individual, EMILY SYLVAN KIM, an individual,  
PROSPECT AGENCY, LLC, a New Jersey limited  
liability company, ENTANGLED PUBLISHING, LLC, a  
Delaware limited liability company, HOLTZBRINCK  
PUBLISHERS, LLC, D/B/A/ MACMILLAN, a New  
York limited liability company, UNIVERSAL CITY  
STUDIOS, LLC, a Delaware limited liability company,  
CRAZY MAPLE STUDIO, INC, a California corporation

**PLAINTIFF LYNNE  
FREEMAN'S  
INTERROGATORIES TO  
DEFENDANT TRACY  
DEEBS-ELKENANEY  
P/K/A TRACY WOLFF,  
SET FIVE**

FAC FILED: May 23, 2022

Defendants.

----- x

Propounding Party: Lynne Freeman

Responding Party: Tracy Deebs-Elkenaney p/k/a Tracy Wolff

Set: FIVE

Pursuant to Federal Rule of Civil Procedure Rule 33, Plaintiff Lynne Freeman (“Freeman” or “Plaintiff”) requests that Defendant Tracy Deebs-Elkaney p/k/a Tracy Wolff, answer the following interrogatories under oath and serve them upon Plaintiff within 30 days.

### **DEFINITIONS**

As used in these requests, the following terms are to be interpreted in accordance with these definitions:

- a. “YOU” and “YOUR” shall mean defendant Tracy Deebs-Elkaney p/k/a Tracy Wolff.
- b. “ACTION” shall mean this action filed in the United States District Court for the Southern District of New York (Case No. 1:22-cv-02435-AT) entitled Lynne Freeman v. Tracy Deebs-Elkaney p/k/a Tracy Wolff et. al.
- c. “CRAVE BOOK SERIES” shall mean the books entitled *Crave*, *Crush*, *Covet*, *Court*, *Charm* and *Cherish*.
- d. “BMR” shall mean any and all versions of the manuscript that FREEMAN alleges in the First Amended Complaint filed in the Action that she wrote, including, but not limited to, the versions entitled *Blue Moon Rising* and *Masqued*, and she alleges was infringed by the books in the CRAVE SERIES entitled *Crave*, *Crush*, *Covet* and *Court*.
- e. “COWAN FIRM DEFENDANTS’ ANSWER” shall mean the Answer and Affirmative Defenses of the of Tracy Deebs-Elkaney p/k/a Tracy Wolff, Entangled Publishing, LLC, Holtzbrink Publishers, LLC, d/b/a Macmillan and Universal City Studios, LLC dated June 27, 2022 filed in this ACTION.

**INTERROGATORIES**

**INTERROGATORY NO. 23:**

With respect to each book in the CRAVE BOOK SERIES, please update your response to Interrogatory No 4 in Plaintiff Lynne Freeman's Interrogatories to Defendant Tracy Deeb-Elkenaney p/k/a Tracy Wolff, Set One, to include a description of the source of the revenues, the amount of revenues and the dates when such revenues were received or accrued by YOU in connection with each book in the CRAVE BOOK SERIES, including, but not limited to, any revenues received from any of the other Defendants in this ACTION, up to the date of YOUR response to this Interrogatory.

**INTERROGATORY NO. 24:**

With respect to each book in the CRAVE BOOK SERIES, please update your response to Interrogatory No. 5 in Plaintiff Lynne Freeman's Interrogatories to Defendant Tracy Deeb-Elkenaney p/k/a Tracy Wolff, Set One, to include all expenses incurred by YOU directly in connection with the writing or exploitation of each book in the CRAVE BOOK SERIES up to the date of your response to this Interrogatory, such response shall include a description of the expenses, the amount of the expenses and the date of the expenses.

Dated: November 29, 2022

CSReeder, P.C.  
Attorneys for Plaintiff

By: 

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Mark D. Passin  
11766 Wilshire Blvd., Suite 1470  
Los Angeles, CA 90025  
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**PROOF OF SERVICE**

STATE OF CALIFORNIA           )  
COUNTY OF LOS ANGELES    )   ss:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 11766 Wilshire Blvd., Suite 1470, Los Angeles, CA 90025.

On November 30, 2022 I served the foregoing document described as **PLAINTIFF LYNNE FREEMAN'S INTERROGATORIES TO TRACY DEEBE-ELKENANEY P/K/A TRACY WOLFF, SET FIVE** on the parties in this action listed below as follows:

Nancy Wolff <a href="mailto:nwolff@cdas.com">nwolff@cdas.com</a> CeCe Cole <a href="mailto:ccole@cdas.com">ccole@cdas.com</a> <a href="#">Benjamin Halperin</a> BHalperin@cdas.com Cowan, DeBaets, Abrahams & Sheppard LLP  Dwayne Goetzel <a href="mailto:dgoetzel@intprop.com">dgoetzel@intprop.com</a> Kowert, Hood, Munyon, Rankin & Goetzel	<i>Attorneys for Defendants,</i> TRACY DEEBE-ELKENANEY P/K/A TRACY WOLFF, ENTANGLED PUBLISHING, LLC, HOLTZBRINCK PUBLISHERS, LLC, D/B/A/ MACMILLAN, UNIVERSAL CITY STUDIOS, LLC
Lacy Herman Koonce, III <a href="mailto:lance.koonce@klarislaw.com">lance.koonce@klarislaw.com</a> Zachary M. Press <a href="mailto:zpress@klarislaw.com">zpress@klarislaw.com</a> Klaris Law	<i>Attorneys for Defendants,</i> EMILY SYLVAN KIM, PROSPECT AGENCY, LLC

☐ **BY MAIL:** By placing a true and correct copy of the above-described document(s) in envelope(s), addressed as set forth above, with first class postage pre-paid for delivery to the above-named persons at the above-listed addresses and depositing such envelopes in a US mail collection box.

☐ **BY OVER NIGHT DELIVERY, VIA FED-EX:** I gave the document(s) to our overnight courier service for delivery to the offices of the addressee, addressed as set forth above.

☐ **BY PERSONAL SERVICE, VIA FIRST LEGAL ATTORNEY SERVICE:** I gave said documents to the firm's regular attorney service with specific instructions to be personally delivered by hand to the offices of the addressee, addressed as set forth above.



☐ **BY PERSONAL SERVICE (*Ex Parte*):** I personally delivered by hand to the attorney in attendance on behalf of the above-named counsel at the hearing of \_\_\_\_\_, in Department \_\_\_\_ of the \_\_\_\_\_ Courthouse, \_\_\_\_\_, California.

☒ **BY ELECTRONIC MAIL:** I transmitted said document(s) to the person(s) shown above by electronic mail to the email address shown above.

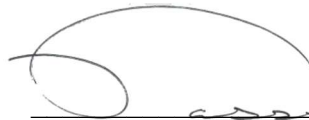
☐ **BY FACSIMILE:** I faxed said document(s) to the addressee, at the specified fax numbers shown above.

☐ **COURTESY COPY BY ELECTRONIC MAIL:** I transmitted courtesy copies of said document(s) to the person(s) shown above by electronic mail to the email address shown above.

☐ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on November 30, 2022, at Los Angeles, California.

  
\_\_\_\_\_  
Mark D. Passin